

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

JUL 21 PM 2:06

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

No. 3:15-CR-044-D

MUHAMMAD FARIDI (28)

FACTUAL RESUME

Muhammad Faridi, the defendant, Richard Roper, the defendant's attorney, and the United States of America agree that the following facts are true and correct and may be used to support Faridi's plea of guilty to Count One of the Superseding Information:

Elements of the Offense

Count One

Conspiracy to Launder Monetary Instruments  
(Violation of 18 U.S.C. § 1956(h))

- First: There was an agreement between two or more persons to commit money laundering; and
- Second: That the defendant joined the agreement knowing its purpose and with the intent to further the illegal purpose.

Facts

Muhammad Faridi is not a doctor licensed by the State of Texas, does not have a DEA registration, and has no authority to distribute or dispense controlled substances. Beginning in January 2013 and continuing through July 2014, he and his co-conspirators, including Dr. Richard Andrews and Ndufolo Kigham, distributed and caused to be distributed at least 150,000 30mg oxycodone pills in Dallas, Texas, and elsewhere through McAllen Medical Clinic in Dallas, Texas, which he ~~owned and~~ operated with Dr. PK MR


Richard Andrews. The prescriptions were issued under the name and DEA registration number of co-conspirator Dr. Richard Andrews, the supervising physician of McAllen. Faridi knew that none of the prescriptions for the 30mg oxycodone had been issued for a legitimate medical purpose by a medical practitioner acting in the usual course of professional practice.

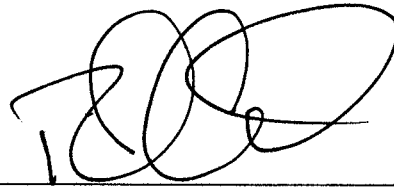
Faridi and his co-conspirators, including Dr. Richard Andrews, conspired to conduct financial transactions with the proceeds of this drug-trafficking to conceal and disguise the nature, location, source, ownership, or control of those proceeds. Specifically, Faridi admits that he knowingly combined, conspired, confederated, and agreed with Dr. Richard Andrews, and others both known and unknown, to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, that is, to transfer \$25,000.00 to Richard Andrews in the form of a check numbered 992 drawn on a Bank of America account ending in 5205 in the name of KHI Medical Solutions, Inc., and controlled by Muhammad Faridi, made payable to Richard Andrews, involving the proceeds of specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute a controlled substance, namely oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. § 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, or control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the transaction represented the proceeds of some form of unlawful activity.


Muhammad Faridi therefore admits that, on February 20, 2013, in the Dallas

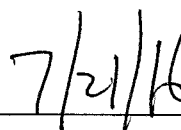
Division of the Northern District of Texas and elsewhere, he knew there was an agreement between Dr. Richard Andrews and others to commit money laundering and he joined in this agreement with the intent to further its illegal purpose, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h).


This Factual Resume is not intended to be a complete accounting of all of the facts and events related to the offense charged in this case. Instead, it is intended only to demonstrate that a factual basis exists to support the defendant's plea of guilty to Count One of the Superseding Information.

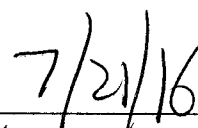
  
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MARY F. WALTERS  
Assistant United States Attorney

  
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RICK CALVERT  
Deputy Chief

  
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MUHAMMAD FARIDI  
Defendant

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
RICHARD ROPER  
Attorney for Defendant

  
\_\_\_\_\_  
Date